

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

IN RE:

ANTHONY KERR,

Debtor.

Chapter 13

Case No. 1-23-42356 (NHL)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

TAKE NOTICE that, the law firm set forth below appears as counsel for Constitution CR, LLC (“CCL”), creditor and party in interest, in the captioned Chapter 13 bankruptcy case, and pursuant to Rules 2002, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Section 1109(b) of Title 11 of the United States Code, as amended (the “Bankruptcy Code”), requests that the following name and address be added to the mailing list maintained by the Clerk of the Court and Debtor in this case, and further demands that all notices given or required to be given in this case, and all papers served or required to be served in this case by all counsel, parties-in-interest, and this Court, be given to and served upon the following counsel:

Bryan D. Leinbach, Esq.
Zeichner Ellman & Krause LLP
1211 Avenue of the Americas
New York, New York 10036
Telephone: (212) 223-0400
Fax: (212) 753-0396
bleinbach@zeklaw.com

TAKE FURTHER NOTICE that, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules and Bankruptcy Code, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral, and whether transmitted, conveyed by mail, hand delivery, telephone, telegraph, telex, e-mail or otherwise, which affects the Debtor or property of the Debtor or the rights of creditors and parties-in-interest such as CCL.

TAKE FURTHER NOTICE that, CCL does not intend that this Notice of Appearance and Request for Service of Papers or any later appearance or pleading be deemed or construed to be a waiver of its right: (i) to have final orders in non-core matters entered only after de novo review by a United States District Judge; (ii) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; (iii) to have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; and (iv) to any other rights, claims, actions, setoffs, or recoupments to which it is or may

be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments CCL expressly reserves.

Dated: New York, New York
August 1, 2023

ZEICHNER ELLMAN & KRAUSE LLP

By: /s/Bryan D. Leinbach

Bryan D. Leinbach, Esq.
1211 Avenue of the Americas
New York, New York 10036
(212) 223-0400
bleinbach@zeklaw.com

Attorneys for Constitution CR, LLC

To: All Parties who have appeared by ECF